

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: VideoMining Corporation,	:	Bankr. No.: 20-20425-GLT
	:	
Debtor.	:	Chapter 11
	:	
<hr style="width: 40%; margin-left: 0;"/>	:	Document No.:
Atul Jain,	:	
	:	Related Document No.:
Movant,	:	
	:	
v.	:	
	:	
No Respondent,	:	
	:	
Respondent.	:	

MOTION TO ALLOW LATE PROOF OF CLAIM

AND NOW comes the Movant, Atul Jain (“Movant”), by and through his undersigned Counsel, and files the following Motion to Allow Late Proof of Claim, and in support thereof, Movant respectfully states as follows:

I. Factual and Procedural Background to the Proof of Claim

1. Debtor, VideoMining Corporation (hereafter “Debtor”), filed the within Chapter 11 on February 4, 2020.
2. Debtor filed a Schedule F listing Movant’s claim as a \$750,000.00 unliquidated, not disputed, claim.
3. By notice dated March 13, 2020, the deadline for the filing of a proof of claim was set for July 21, 2020.
4. As set forth in the Proof of Claim attached hereto as Exhibit A, Movant seeks payment for pre-petition money loaned, plus interest, in the amount of \$808,027.09.

5. Debtor, through counsel, has consented to the filing of an untimely proof of claim.

WHEREFORE, Movant respectfully moves this Honorable Court to allow it to file a Proof of Claim, *nunc pro tunc*.

Respectfully submitted,

THOMPSON LAW GROUP, P.C.

Date: February 24, 2021

By: /s/ Brian C. Thompson
Brian C. Thompson, Esquire
Pa. ID No. 91197
THOMPSON LAW GROUP, P.C.
125 Warrendale-Bayne Road, Suite 200
Warrendale, Pennsylvania 15086
(724) 799-8404 Telephone
(724) 799-8409 Facsimile
bthompson@thompsonattorney.com